

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**  
Greenbelt Division

IN RE:

WILLIAM JACK MOATS  
STELLA LOUISE PLUMER

Case No.: 18-17149-TJC

Chapter: 13

Debtors

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**OBJECTION TO CONFIRMATION OF DEBTOR'S PROPOSED CHAPTER 13 PLAN**

COMES NOW, Seterus, Inc. as the authorized servicer for Federal National Mortgage Association ("Fannie Mae"), creditor c/o Seterus, Inc. ("Creditor"), by and through counsel, and files its Objection to Debtor's Chapter 13 Plan, and as reasons therefor respectfully represents as follows:

1. Creditor is a mortgage lender/servicer.
2. On or about May 25, 2018, William Jack Moats and Stella Louise Plumer ("Debtors") filed a Voluntary Petition in this Court under Chapter 13 of the United States Bankruptcy Code.
3. Nancy Spencer Grigsby is the Chapter 13 Trustee of the Debtor's bankruptcy estate.
4. Creditor holds a Deed of Trust solely secured by the Debtor's property located in St. Mary's County, Maryland, and improved by a residence known as 26782 Lynndale Court, Mechanicsville, MD 20659 (the "Property").
5. On or about June 14, 2018, Debtor filed a Chapter 13 Plan (the "Plan"). The treatment as to Seterus's claim is vague and ambiguous. It is ambiguous inasmuch as treatment is proposed both outside (section 4.6.5) and inside (section 4.6.2) of the Plan. It is vague inasmuch as it indicates an intention to modify the loan, but lacks any definite parameters (e.g., timeframe within which modification will be sought, alternate treatment in the event such efforts are not realized) regarding those pursuits.
6. Debtor's Plan is underfunded and is therefore not confirmable.
7. Creditor does not oppose denial of the Plan with leave to amend or continuance, as proper for disposition of this matter.

WHEREFORE, the Creditor its successors and/or assigns prays that this Court:

1. Enter an order DENYING confirmation of the Debtor's Chapter 13 Plan; and
2. Grant such other and further relief as necessary.

Respectfully Submitted,

Dated: August 13, 2018

/s/ Daniel O. Callaghan

Daniel O. Callaghan, MD Fed. Bar No. 13901  
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*Attorney for the Creditor*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13rd day of August, 2018, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing Objection to Chapter 13 Plan will be served electronically by the Court's CM/ECF system on the following:

Nancy Spencer Grigsby, Trustee

John Douglas Burns, Attorney

I hereby further certify that on this 13rd day of August, 2018, a copy of the Objection to Chapter 13 Plan was also mailed first class mail, postage prepaid, to:

William Jack Moats  
26782 Lynndale Ct.  
Mechanicsville, MD 20659

Stella Louise Plumer  
26782 Lynndale Ct.  
Mechanicsville, MD 20659

/s/ Daniel O. Callaghan

Daniel O. Callaghan, Esq.